



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

April 22, 2015

By Email & ECF

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Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find alternative versions of documents previously disclosed in discovery: unredacted versions of the account opening documents for defendant Kenner's various accounts at Northern Trust Bank (NTC 12875-13044; password: "Northern2015!"); versions of the closing documents for two sales of Hawaii properties obtained directly from First American Title (FA-TITLE 2489-2522); and copies of wire requests submitted to Charles Schwab directly from the bank's files (BNK-CS 14243-14256).

The government also provides written notice that it intends to offer certain business records via certifications pursuant to Federal Rule of Evidence 902(11): Citibank (Apr. 22, 2015) (records: BNK-CITI 50-302); JP Morgan Chase (Apr. 23, 2015) (duplicate certification) (records: BNK-CHASE 1-2642); and TD Bank (records: attached).

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)